

EXHIBIT L

9/26/2024

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IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

RICHARD KADREY, et al.,) Case No.
Individual and Representative)
)
Plaintiffs,) 3:23-cv-03417-VC
)
- against -)
)
META PLATFORMS, Inc.,)
)
Defendant.)
)

* * H I G H L Y C O N F I D E N T I A L * *
* * A T T O R N E Y S' E Y E S O N L Y * *

VIDEO-RECORDED DEPOSITION
OF
ELEONORA PRESANI, Ph.D.
September 26, 2024

Reported Stenographically by:
ANNETTE ARLEQUIN, CCR/CSR, RPR, CRR, RSA

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1 corners, he's suggesting using LibGen?

2 MS. DUNNING: Object to the form.

3 A. I don't know that that is exactly
4 what he means.5 Q. Do you have an understanding of what
6 he meant when he says to you, "...cut some
7 corners here and there"?

8 MS. DUNNING: Same objection.

9 A. No, my interpretation is just that
10 he was trying to get me to stop.11 Q. To stop protesting using LibGen and
12 Sci-Hub?

13 MS. DUNNING: Object to the form.

14 A. Yeah, to -- well, I think more
15 generic -- generally, he was trying to say that
16 what, like, I was much more risk-averse than he
17 was. Risk-averse, like I was trying to avoid
18 risks, and, to me, that was my priority. And
19 from his perspective, his priority is to develop
20 models as quickly as possible. So we were having
21 this conversation.

22 Q. You respond one more time in this

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1 message thread, right?

2 A. I do.

3 MS. DUNNING: Object to the form.

4 A. I do respond again.

5 Q. You say, "I agree with all of you
6 that we should have a risk analysis and I want to
7 help getting approvals for data," right?

8 A. Yes.

9 Q. Who gave approvals for the use of
10 data?

11 MS. DUNNING: Object to the form.

12 A. It was not just one person. The
13 reason -- so what I was referring here is to go
14 through the process of requesting approval, you
15 have to go -- you have an internal review process
16 and there's people assigned to it.

17 Q. Sitting here today, do you recall
18 some of those people who you had to request
19 approvals from?

20 MS. DUNNING: Object to the form.

21 A. Well, I know that at least one of
22 the people is within our legal department.

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1 Q. Is there anyone who's not in the
2 legal department that you remember?

3 A. There's a number of approvals for
4 each of these, like, requests that go from
5 communication to legal, but I think the last word
6 is either with legal or -- yeah, I don't know.

7 Legal, I would say.

8 Q. You go on, right? So you talk about
9 policy. Now is policy is a separate department
10 from legal?

11 A. Yes, and they are also part of the
12 loop of approvals.

13 Q. Now do you know anyone in policy
14 that would -- you would request approval from?

15 A. Again, it's not like -- we are not
16 choosing the people that are making the
17 approvals. You make the request.

18 There is a triage system that
19 assigns one person from each department, so there
20 is one person from legal, one person from policy,
21 one person from, I don't know, comps or whatever
22 is. There's also research managers, like

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1 leadership within the research group that needed
2 to check and approve the whole system.

3 And it's usually very difficult for
4 researchers to go through the entire process.

5 That's why I offered to help.

6 Q. Would Mr. Al-Dahle make approvals?

7 MS. DUNNING: Object to the form.

8 A. Sorry, mister who?

9 Q. Would Mr. Al-Dahle?

10 A. That would be rare. It would be
11 rare to escalate at his level.

12 Q. So there are individuals below
13 Mr. Al-Dahle who would make approvals?

14 MS. DUNNING: Object to the form.

15 A. Yeah, like I said, it's people from
16 different departments.

17 MS. DUNNING: Counsel, I'm trying
18 not to interrupt your flow, but we have been
19 going for almost an hour and a half.

20 MR. YOUNG: I'm almost done.

21 MS. DUNNING: Okay.

22 BY MR. YOUNG: